

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

JERRY LEON DEES, JR., )  
                            )  
Plaintiff,              )  
                            )  
vs.                      )  
HYUNDAI MOTOR MANUFACTURING )                   CASE NO.  
ALABAMA, LLC, and HYUNDAI MOTOR ) 2:07-cv-00306-MHT-CSC  
AMERICA, INC.,          )  
                            )  
Defendants.             )

**PETITION FOR ADMISSION PRO HAC VICE**

Defendants Hyundai Motor Manufacturing Alabama, LLC (“HMMA”) and Hyundai Motor America, Inc. (“HMA”), by counsel and pursuant to Local Rule 83.1(b), petition this Court for the *pro hac vice* admission of Matthew K. Johnson to practice before this Court for the above-styled matter. In support of this petition, HMMA and HMA show as follows:

1.       Matthew K. Johnson is a member in good standing of the bar of the highest court of the State of South Carolina and the United States District Court for the District of South Carolina, where he resides and regularly practices law.
2.       The Affidavit of Matthew K. Johnson in support of this petition is attached as “Exhibit 1.”
3.       A Certificate of Good Standing from the United States District Court, District of South Carolina, is attached to this petition as “Exhibit 2.”
4.       Matthew K. Johnson’s representation of HMMA and HMA shall be in association with J. Trent Scofield and T. Scott Kelly, members in good standing of the Alabama Bar and the United States District Court for the Middle District of Alabama.

5. The filing fee check payable to Clerk, U. S. District Court in the amount of \$20.00 (copy attached as "Exhibit 3") will be delivered to the Clerk's Office via Federal Express May 11, 2007.

WHEREFORE, this petition is based upon Local Rule 83.1(b), the Affidavit of Matthew K. Johnson attached as "Exhibit 1," the Certification of Good Standing attached as "Exhibit 2," and all applicable common and statutory law.

/s/ J. Trent Scofield

J. Trent Scofield (SCO-024)  
OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.  
One Federal Place, Suite 1000  
1819 Fifth Avenue North  
Birmingham, AL 35203  
Tel.: (205) 328-1900  
Fax: (205) 328-6000  
E-mail: trent.scofield@odnss.com

One of the Attorneys for Defendants  
Hyundai Motor Manufacturing Alabama, LLC  
and Hyundai Motor America, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of May, 2007, I electronically filed the foregoing *Petition for Admission Pro Hac Vice on behalf of Matthew K. Johnson* with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: W. Perry Hall, Vincent F. Kilborn, III, David Allen McDonald, Jeffrey Rayborn Sport, and T. Scott Kelly.

/s/ J. Trent Scofield

J. Trent Scofield (SCO-024)  
OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.  
One Federal Place, Suite 1000  
1819 Fifth Avenue North  
Birmingham, AL 35203  
Tel.: (205) 328-1900

# **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

JERRY LEON DEES, JR., )  
Plaintiff, )  
vs. )  
HYUNDAI MOTOR MANUFACTURING )  
ALABAMA, LLC, and HYUNDAI MOTOR )  
AMERICA, INC., )  
Defendants. )

**CASE NO.  
2:07-cv-00306-MHT-CSC**

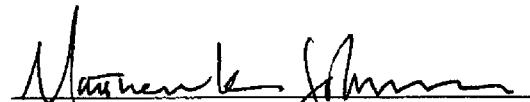
**AFFIDAVIT OF MATTHEW K. JOHNSON IN SUPPORT  
OF PETITION FOR ADMISSION PRO HAC VICE**

PERSONALLY APPEARED before me Matthew K. Johnson, who, after being duly sworn, deposes and states as follows:

1. I am an attorney and a shareholder of the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C., located at 300 N. Main Street, Suite 500, Greenville, South Carolina, 29601, (864) 271-1300, with additional offices located at One Federal Place, Suite 1000, 1819 Fifth Avenue North, Birmingham, AL 35203-2118, (205) 328-1900.
2. My business mailing address is: Ogletree, Deakins, Nash, Smoak & Stewart, P.C., P.O. Box 2757, Greenville, South Carolina, 29602.
3. I am a resident of the State of South Carolina.
4. I am a graduate of Rhodes College, B.A., 1991, and the University of Memphis, Cecil C. Humphreys School of Law, J.D., 1996.
5. I am a member in good standing with the South Carolina Bar since 1996. I have been assigned SC Bar No. 12284.
6. I am a member in good standing with the United States District Court for the District of South Carolina since 1997. I have been assigned Federal Bar No. 6908.

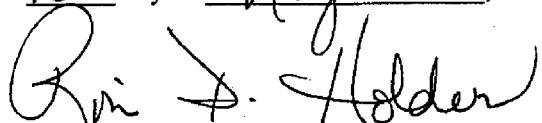
7. I am a member in good standing with the United States Court of Appeals, Fourth Circuit, since 1998.
8. I am not subject to any disbarment proceedings.
9. I am not subject to any suspension proceedings.
10. I have never been subject to any disbarment proceedings.
11. I have never been subject to any suspension proceedings.
12. I have never had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked.
13. I have never, either by resignation, withdrawal, or otherwise, terminated or attempted to terminate my office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.
14. I am not presently subject to any suspension or disbarment proceedings, and have not been notified of any complaints pending before a disciplinary agency.
15. I have never had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked.
16. I have been retained by Hyundai Motor Manufacturing Alabama, LLC and Hyundai Motor America, Inc., to provide legal representation in connection with the above-referenced action now pending in the United States District Court for the Middle District of Alabama, Northern Division.
17. The above-referenced action involves allegations concerning the Uniformed Services Employment and Reemployment Rights Act of 1994, 38 U.S.C. §§ 4301—4334 (“USERRA”). I have previous experience handling USERRA matters and, accordingly, Hyundai Motor Manufacturing Alabama, LLC and Hyundai Motor America, Inc., will derive a benefit from my *pro hac vice* admission.
18. Local counsel of record associated with me in this matter is J. Trent Scofield, an attorney and shareholder with the firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C., One Federal Place, Suite 1000, 1819 Fifth Avenue North, Birmingham, AL 35203-2118, (205) 328-1900.
19. I agree to comply with the statutes, laws and rules applicable in the above-named court.

20. I respectfully request to be admitted to practice in the above-named court for this cause only.



Matthew K. Johnson  
South Carolina Bar No.: 12284  
South Carolina Federal Bar No.: 6908

Sworn to and Subscribed before me this  
10<sup>th</sup> day of May, 2007.



Notary Public for South Carolina

My Commission Expires: 10/27/2007

# **EXHIBIT 2**

AO 136  
(Rev. 6/82)

## CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

DISTRICT OF SOUTH CAROLINA

I, Larry W. Propes, Clerk of the United States District Court, District of South Carolina,

DO HEREBY CERTIFY That Matthew K Johnson, ID# 6908, was duly admitted to practice in said Court on October 15, 1997, and is in good standing as a member of the bar of said Court.

Dated at Greenville, South Carolina

Larry W. Propes, Clerk

on May 2, 2007.

By   
Deputy Clerk

# **EXHIBIT 3**

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.  
ONE FEDERAL PLACE, SUITE 1000  
1819-5TH AVENUE NORTH  
BIRMINGHAM, AL 35203-2118



67-188/532

05-09-07

PAY TO THE Clerk, U. S. District Court \$ 20.00  
ORDER OF TWENTY AND 00/100 DOLLARS DOLLARS

Clerk, U. S. District Court

Dees v. Hyundai  
2:07 cv 00306 - MHT-CSC

MEMO 006363-000034 - Matthew Johnson - pro hac vice

A handwritten signature in black ink, appearing to read "Matthew Johnson".

AUTHORIZED SIGNATURE

# 11006955 # 053201885#7190000158#

# **PROPOSED ORDER**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

JERRY LEON DEES, JR., )  
                            )  
Plaintiff,               )  
                            )  
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HYUNDAI MOTOR MANUFACTURING )                          **2:07-cv-00306-MHT-CSC**  
ALABAMA, LLC, and HYUNDAI MOTOR )  
AMERICA, INC.,             )  
                            )  
Defendants.              )

**ORDER GRANTING PETITION FOR ADMISSION *PRO HAC VICE***

J. Trent Scofield, of Ogletree, Deakins, Nash, Smoak & Stewart, P.C., having filed a Petition for Admission *Pro Hac Vice* on behalf of Matthew K. Johnson, and the Court, being duly advised, now grants the Petition. Matthew K. Johnson is hereby granted permission to appear *pro hac vice* in this case on behalf of Defendants Hyundai Motor Manufacturing Alabama, LLC and Hyundai Motor, Inc.

IT IS SO ORDERED this \_\_\_\_\_ day of May, 2007.

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U. S. District Court Judge